

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**PATRICK HALEY, on behalf of  
himself and all others similarly  
situated,**

**Plaintiff,**

**v.**

**DELTA AIRLINES, INC.,**

**Defendant.**

**Case No. 1:21-cv-01076-TCB**

**JURY TRIAL DEMANDED**

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**PLAINTIFF’S UNOPPOSED MOTION TO CONSOLIDATE**

Pursuant to Rule 42 of the Federal Rules of Civil Procedure, Plaintiff Patrick Haley respectfully moves this Court to consolidate this action with *Reep v. Delta Airlines, Inc.*, 1:21-cv-01005-TCB (*Reep*). The Plaintiff in *Reep* joins this motion. Defendant Delta Airlines, Inc. does not oppose this motion on the condition that it receives 45 days to respond to the Plaintiffs’ consolidated amended complaint.

For the reasons stated in Plaintiff’s accompanying memorandum of law in support, Plaintiff requests that the Court grant the motion and allow the plaintiffs in *Haley* and *Reep* leave to file an amended consolidated complaint within 14 days of the entry of the order consolidating the cases. Plaintiff also requests that the Court enter an order approving dates for Defendant to file a responsive pleading and, if

Defendant files a motion, for the parties to brief that motion. A proposed order is attached.

Dated: June 11, 2021

Respectfully submitted,

/s/ Peter Romer-Friedman

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 11, 2021, I electronically filed the foregoing brief with the Clerk of The United States District Court for the Northern District of Georgia using the CM/ECF system. All participants are registered CM/ECF users and have been served by the CM/ECF system.

/s/ Peter Romer-Friedman

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